

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

---

In re:

JOANN INC.,<sup>1</sup>

Post-Effective Date Debtor.

---

)  
)  
)  
)  
)  
)  
)

Chapter 11

Case No. 25-10068 (CTG)

**CERTIFICATION OF COUNSEL REGARDING APPROVAL  
OF JOINT STIPULATION REGARDING CLAIMS OF  
LA HABRA WESTRIDGE PARTNERS, L.P.**

Ann Aber, solely in her capacity as the Plan Administrator (the “Plan Administrator”) appointed in the above-captioned case, and La Habra Westridge Partners, L.P. (“Landlord” and together with the Plan Administrator, collectively, the “Parties”), entered into a stipulation and hereby certify as follows:

1. The Landlord’s lease was rejected effective May 31, 2025.
2. On or about April 1, 2025, Landlord filed a Proof of Claim designated as Claim No. 10393. Claim No. 10393 asserts claims totaling \$103,437.46, including administrative expense claims totaling \$56,661.36
3. Claim No. 10393 has been paid in part, as Landlord acknowledges the subsequent receipt of its administrative rent claim for April 2025, leaving the remainder of the administrative claim for the second half of 2024/25 real estate taxes, which remain due, subject to adjustment for the rejection date.
4. Plan Administrator and Landlord hereby agree to resolve the administrative claims set forth in Claim No. 10393 by the payment of \$29,646.61, and further agree that upon Landlord’s

---

<sup>1</sup> The Post-Effective Date Debtor in this chapter 11 case, along with the last four digits of its federal tax identification number is JOANN Inc. (5540). The Post-Effective Date Debtor’s mailing address is 5555 Darrow Road, Hudson, Ohio 44236.

receipt of such payment the administrative expense claims set forth in Claim No. 10393 shall be deemed withdrawn with prejudice.

5. On or about June 17, 2025, Landlord filed a Proof of Claim designated as Claim No. 18707. Claim No. 18707 asserts claims totaling \$706,693.64, including administrative expense claims totaling \$42,900.00.

6. The \$42,900.00 claim consists of clean-out expenses.

7. Plan Administrator and the Landlord hereby agree to resolve the administrative claims set forth in Claim No. 18707 by re-classifying the entirety of Claim No. 18707, including the administrative expense claim of \$42,900.00, as a general unsecured claim.

8. This Stipulation resolves *Plan Administrator's Seventeenth (Substantive) Omnibus Objection to Certain Claims (Unliquidated Claims and Overstated Claims)* [Docket No. 1860] (the "Overstated Objection") solely as to Claim No. 10393. The Parties stipulate and agree that the Plan Administrator may prepare and submit any order in respect of the Overstated Objection that is consistent with this Stipulation.

9. Nothing contained herein constitutes the allowance of any unsecured claim of Landlord.

10. A proposed order approving the Stipulation is attached hereto as **Exhibit A** (the "Proposed Order").

11. A copy of the Stipulation is attached as **Exhibit 1** to the Proposed Order.

12. Accordingly, the Parties request entry of the Proposed Order attached hereto as **Exhibit A** at the Court's earliest convenience.

*[Remainder of Page Intentionally Left Blank]*

Dated: December 17, 2025  
Wilmington, Delaware

/s/ Patrick J. Reilley

**COLE SCHOTZ P.C.**

Patrick J. Reilley (No. 4451)  
Stacy L. Newman (No. 5044)  
Jack M. Dougherty (No. 6784)  
Michael E. Fitzpatrick (No. 6797)  
500 Delaware Avenue, Suite 600  
Wilmington, Delaware 19801  
Telephone: (302) 652-3131  
Facsimile: (302) 652-3117  
Email: preilley@coleschotz.com  
snewman@coleschotz.com  
jdougherty@coleschotz.com  
mfitzpatrick@coleschotz.com

- and -

**HAHN LOESER & PARKS LLP**

Christopher B. Wick (admitted *pro hac vice*)  
Philip K. Stovall (admitted *pro hac vice*)  
200 Public Square, Suite 2800  
Cleveland, Ohio 44114  
Telephone: (216) 274-2489  
Facsimile: (216) 241-2824  
Email: cwick@hahnlaw.com  
pstovall@hahnlaw.com

*Co-Counsel to the Plan Administrator*